



1 after you guys purchased it up until the subject  
2 loss?

3 A. Excuse me?

4 Q. Let me just ask you.

5 A. Sure.

6 Q. You purchased this house that you guys are living  
7 in now in 2020; correct?

8 A. Yes.

9 Q. And this loss, the claim notes indicate a date of  
10 loss of December of '21 or January of '22; correct?

11 A. Correct.

12 Q. Did you guys make any roof repairs or modifications  
13 to the house from the time you bought it in 2020 up  
14 until December of '21?

15 A. Just the paint.

16 Q. And I think she said that was JJ's, if I remember  
17 correctly, or J --

18 A. I believe so.

19 Q. We talked earlier with your wife about the Father's  
20 Day storm that came through and affected most of  
21 Tulsa.

22 A. Uh-huh.

23 Q. Do you recall that?

24 A. Oh, yes.

25 Q. And tell me what your recollection is of any damage

1           that was sustained to your house in that storm.

2       A.   That's when the blue tarp flew off like a kite like  
3           everything else around in the neighborhood.

4       Q.   And you're talking about the tarp that was placed  
5           by OCR?

6       A.   Correct.

7       Q.   In this claim?

8       A.   Yes.

9       Q.   Okay.   So it blew off.   Were you outside when it  
10           blew off?

11      A.   Are you kidding me?

12      Q.   Well, you said it flew like a kite, so are you --  
13           did you see it fly like a kite or are you just  
14           assuming that it flew like a kite?

15      A.   I'm assuming, I'm sure.

16      Q.   Okay.   Well, I don't want you to assume.   I just  
17           want to know what you know or what you don't know.  
18           That's all I'm here to do today; okay?

19      A.   Okay.

20      Q.   Nonetheless, you determined that the tarp got blown  
21           off --

22      A.   Correct.

23      Q.   -- at some point?   Did you know the next day?

24      A.   Yes.

25      Q.   Okay.   Any other damage you observed other than the

1 tarp being gone?

2 A. Like I said, I'm not getting on that roof. I  
3 handle it -- let the professionals handle that. I  
4 called them. They came out and the tarp grew  
5 probably 200 percent.

6 Q. Understand. I've seen your roof. My dad is a  
7 roofer. I grew up roofing. Your roof is steep. I  
8 don't blame you for not getting up there.

9 But my question is: When you see the tarp is  
10 gone, you can see where there are no shingles, true,  
11 from the ground?

12 A. Maybe.

13 Q. Okay. Did you observe any other damage? Even  
14 though you didn't get up on the roof, did you  
15 observe any other damage other than the tarp being  
16 gone?

17 A. I don't recall.

18 Q. Did you have any leaking as a result of the  
19 Father's Day storm?

20 A. I don't recall.

21 Q. You said that a new tarp was placed on your roof?

22 A. Correct.

23 Q. Who did that?

24 A. OCR.

25 Q. When did they do that?

1 Q. Okay. Do you have any training as it relates to  
2 determination of hail damage or wind damage to  
3 shingles?

4 A. No.

5 Q. When did you first become aware of this claim?  
6 When did you notice the loss?

7 A. When a storm that came through, there was lots of  
8 hail. There was -- it kept everybody up. It was --  
9 nobody went to bed until like 3:00 in the morning.  
10 The next day, shingles were gone and that's when I  
11 became aware that we had a problem.

12 Q. Storm comes through at night.

13 A. Uh-huh.

14 Q. The next day, you go outside and see some shingles  
15 are gone?

16 A. Yes.

17 Q. Are shingles in your yard or are they just missing?

18 A. They're missing.

19 Q. Do you know what day that was?

20 A. I don't recall.

21 Q. Do you recall if that was in January or December?

22 A. I don't recall.

23 Q. And I talked a little bit. I've seen a date of  
24 loss as 12/5/21 and then 1/5/22. Do you have any  
25 knowledge as to which one of those is actually the

1 date of loss?

2 A. Flip a coin. I don't know.

3 Q. How many shingles were missing that you saw?

4 A. Several.

5 Q. Any other damage to the home?

6 A. Hail.

7 Q. Where did you observe hail damage?

8 A. That is for the professionals. I was notified that  
9 there was extensive hail damage.

10 Q. Okay. I want to talk about what you know. What  
11 did you observe? You said you got some missing  
12 shingles.

13 A. Correct.

14 Q. That's the west side, isn't it?

15 A. Correct. Correct.

16 Q. Okay. What else did you observe? You, yourself.

17 A. I'm not quite sure what you're asking for.

18 Q. What other damage to your home did you observe  
19 other than missing shingles?

20 A. Damage to the guttering.

21 Q. What part of the guttering?

22 A. All the way around.

23 Q. Did you walk around the house?

24 A. Yes, I did.

25 Q. And you saw damage to all -- you could see dings in

1 Q. How big was that tarp? Do you know?

2 A. Well, big enough to see it from the ground.

3 Q. Do you recall seeing an invoice for that tarp?

4 A. It was an emergency, so ...

5 Q. Sir, that had nothing to do with my question.

6 A. I don't know.

7 Q. Do you recall seeing an invoice for that tarp?

8 A. No.

9 Q. Okay. I'll represent to you there is an invoice  
10 that has dimensions of that tarp. It's about four  
11 feet.

12 A. Oh, okay.

13 Q. A little bit wider than a standard shingle.

14 A. Okay.

15 Q. Would you have any reason to disagree with that?

16 A. I don't -- I don't -- you know, I don't see why  
17 not.

18 Q. And testimony earlier from your wife was no repairs  
19 were ever made to your roof from the time that tarp  
20 was placed until this Father's Day storm in June of  
21 '23 --

22 A. Correct.

23 Q. -- correct?

24 And in June of '23 the tarp blew off?

25 A. Correct.

1           then there are what we deem expert witnesses.

2       A.   Uh-huh.

3       Q.   Expert witnesses have a certain expertise,  
4           technical or scientific background that are utilized  
5           in cases to explain things to jurors and they're  
6           deemed the experts.

7       A.   Okay.

8       Q.   Do you know if you have retained an expert -  
9           construction expert, roofing expert, claims handling  
10          expert - in this particular case?

11      A.   I would say that a roofing company and a public  
12          adjuster, my opinion, would be experts.

13      Q.   And I'll just say, from your discovery responses,  
14          you've listed Meleah --

15      A.   Yes.

16      Q.   -- at OCR.

17      A.   Yes.

18      Q.   But your discovery responses say you have not yet  
19          retained an expert.  So other than Meleah at OCR,  
20          are you aware of anybody else?

21      A.   No.  No.

22      Q.   Okay.  Interrogatory No. 3.  I think it's page 5.

23      A.   Okay.

24      Q.   There in the middle of it, it just says (as read):  
25          "Plaintiff's contractors sent detailed Xactimate